



Jeff Kane
4530 Wisconsin Ave, NW, Suite 5
Washington, DC 20016
Tel. 202.499.2940
jkane@oandzlaw.com

August 5, 2025

VIA ECF

The Honorable Jennifer L. Rochon
United States District Court for the Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Cengage Learning, Inc. et al. v. Google LLC*, No. 24:cv-04274-JLR-BCM
Letter Request to File Redacted and Sealed Documents

Dear Judge Rochon:

Pursuant to Rule 4(B)(iii)(c) of Your Honor's Individual Rules of Practice in Civil Cases, Plaintiffs respectfully seek the Court's approval to redact 1) portions of Plaintiffs' Letter Motion to Compel; and 2) portions of the Declaration of Attorney Jeff Kane filed in support of Plaintiffs' Letter Motion to Compel; and to seal Exhibit 1 and Exhibit 2 to Plaintiffs' Attorney Declaration (collectively, the "Documents").

The Documents contain information, communications, and produced documents that Google has marked either "Confidential" or "Highly Confidential—Attorneys' Eyes Only" pursuant to the Protective Order, Dkt. 82. Plaintiffs are requesting redactions and sealing solely based on Google's position that the information contained in the redacted and sealed portions is confidential. Plaintiffs take no position on whether the information in the Documents is redacted or sealed.

Pursuant to Your Honor's Individual Rule 4(B)(iii)(a), Plaintiffs conducted a meet-and-confer with Google's counsel on August 5, 2025 to discuss this issue. Google maintained its position that this information must be filed in redacted or sealed form. Pursuant to Your Honor's Individual Rule 4(B)(iii)(a), Plaintiffs will notify Defendant "that it must file, within three days, a letter explaining the need to seal or redact" the information in the Documents.

Respectfully submitted,

/s/ Jeff Kane
Jeff Kane